

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRIAN KEMP, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

COALITION PLAINTIFFS' NOTICE OF FILING DECLARATIONS

Plaintiffs Coalition for Good Governance, William Digges III, Laura Digges, Megan Missett, and Ricardo Davis (the “Coalition Plaintiffs”), in support of their Motion for Preliminary Injunction [Doc. 258], file the following declarations verifying the allegations in the Third Amended Complaint relating to standing:

- Exhibit 1 Laura Digges
- Exhibit 2 William Digges III
- Exhibit 3 Virginia Forney
- Exhibit 4 Marilyn Marks
- Exhibit 5 Megan Missett

Respectfully submitted this 10th day of August, 2018.

/s/ Bruce P. Brown

Bruce P. Brown
Georgia Bar No. 064460
BRUCE P. BROWN LAW LLC
Attorney for Coalition for
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Atlanta, Georgia 30306
(404) 881-0700

/s/ Robert A. McGuire, III

Robert A. McGuire, III
Admitted Pro Hac Vice
(ECF No. 125)
Attorney for Coalition
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Digges III, Laura Digges, Ricardo
Davis, and Megan Missett
ROBERT MCGUIRE LAW FIRM
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Seattle, Washington 98104-2205
(253) 267-8530

/s/ William Brent Ney

William Brent Ney
Georgia Bar No. 542519
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/s/ Cary Ichter

CARY ICHTER
Georgia Bar No. 382515
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Davis and Megan Missett
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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Bruce P. Brown

Bruce P. Brown

Georgia Bar No. 064460

BRUCE P. BROWN LAW LLC

Attorney for Coalition for

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Atlanta, Georgia 30306

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CERTIFICATE OF SERVICE

This is to certify that I have this day caused the foregoing COLATION PLAINTIFFS' NOTICE OF FILING DECLARATIONS to be served upon all other parties in this action by via electronic delivery using the PACER-ECF system.

This 10TH day of August, 2018.

/s/ Bruce P. Brown

Bruce P. Brown
Georgia Bar No. 064460
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1123 Zonolite Rd. NE
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Atlanta, Georgia 30306
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**VERIFICATION BY LAURA DIGGES
OF CERTAIN ALLEGATIONS STATED IN THE THIRD AMENDED
COMPLAINT OF COALITION PLAINTIFFS (DOC. 226)**

1. My name is Laura Digges.
2. I offer this verification to substantiate my standing to bring the claims raised in the *Third Amended Complaint of Plaintiffs Coalition For Good Governance, Laura Digges, William Digges III, Ricardo Davis, and Megan Missett* (the “TAC,” Doc. 226).
3. The facts and allegations pertaining to my standing contained in Paragraphs 24, 154, 157–58, and 159–66 of the TAC are true.
4. If called to testify under oath at an evidentiary hearing on the pending motions for preliminary injunctive relief (Doc. Nos. 258, 260), I would affirm the foregoing facts and allegations to be true.

Pursuant to 28 U.S.C. § 1746, I declare and verify under penalty of perjury that the foregoing is true and correct.

Executed on this date, August 9, 2018.



Laura Digges

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**VERIFICATION BY WILLIAM DIGGES III
OF CERTAIN ALLEGATIONS STATED IN THE THIRD AMENDED
COMPLAINT OF COALITION PLAINTIFFS (DOC. 226)**

1. My name is William Digges III.
2. I offer this verification to substantiate my standing to bring the claims raised in the *Third Amended Complaint of Plaintiffs Coalition For Good Governance, Laura Digges, William Digges III, Ricardo Davis, and Megan Missett* (the “TAC,” Doc. 226).
3. The facts and allegations pertaining to my standing contained in Paragraphs 25, 154, 157–58, and 159–66 of the TAC are true.
4. If called to testify under oath at an evidentiary hearing on the pending motions for preliminary injunctive relief (Doc. Nos. 258, 260), I would affirm the foregoing facts and allegations to be true.

Pursuant to 28 U.S.C. § 1746, I declare and verify under penalty of perjury that the foregoing is true and correct.

Executed on this date, August 09, 2018.


William Digges III

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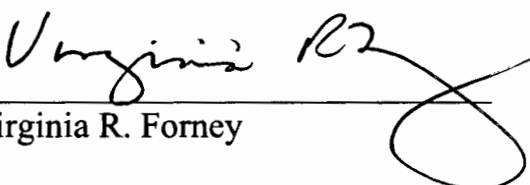
Civil Action No. 1:17-CV-2989-AT

**VERIFICATION BY VIRGINIA R. FORNEY
OF CERTAIN ALLEGATIONS STATED IN THE THIRD AMENDED
COMPLAINT OF COALITION PLAINTIFFS (DOC. 226)**

1. My name is Virginia R. Forney.
2. I offer this verification to substantiate my standing to bring the claims raised in the *Third Amended Complaint of Plaintiffs Coalition For Good Governance, Laura Digges, William Digges III, Ricardo Davis, and Megan Missett* (the “TAC,” Doc. 226).
3. The facts and allegations pertaining to my standing contained in Paragraphs 149–50, 157–58, and 159–66 of the TAC are true.
4. If called to testify under oath at an evidentiary hearing on the pending motions for preliminary injunctive relief (Doc. Nos. 258, 260), I would affirm the foregoing facts and allegations to be true.

Pursuant to 28 U.S.C. § 1746, I declare and verify under penalty of perjury that the foregoing is true and correct.

Executed on this date, August 9, 2018.



Virginia R. Forney

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**VERIFICATION BY MARILYN R. MARKS
OF CERTAIN ALLEGATIONS STATED IN THE THIRD AMENDED
COMPLAINT OF COALITION PLAINTIFFS (DOC. 226)**

1. My name is Marilyn R. Marks.
2. I offer this verification to substantiate Coalition for Good Governance's organizational and associational standing to bring the claims raised in the *Third Amended Complaint of Plaintiffs Coalition For Good Governance, Laura Digges, William Digges III, Ricardo Davis, and Megan Missett* (the "TAC," Doc. 226).
3. The facts and allegations pertaining to Coalition for Good Governance's organizational and associational standing contained in Paragraphs 18–21, 133, 139–44, 145–46, and 148 of the TAC are true.

4. If called to testify under oath at an evidentiary hearing on the pending motions for preliminary injunctive relief (Doc. Nos. 258, 260), I would affirm the foregoing facts and allegations to be true.

Pursuant to 28 U.S.C. § 1746, I declare and verify under penalty of perjury that the foregoing is true and correct.

Executed on this date, August 9, 2018.



Marilyn R. Marks

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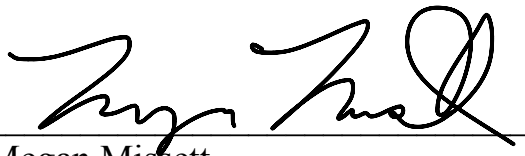
**VERIFICATION BY MEGAN MISSETT
OF CERTAIN ALLEGATIONS STATED IN THE THIRD AMENDED
COMPLAINT OF COALITION PLAINTIFFS (DOC. 226)**

1. My name is Megan Missett.
2. I offer this verification to substantiate my standing to bring the claims raised in the *Third Amended Complaint of Plaintiffs Coalition For Good Governance, Laura Digges, William Digges III, Ricardo Davis, and Megan Missett* (the “TAC,” Doc. 226).
3. The facts and allegations pertaining to my standing contained in Paragraphs 27, 133(b)–(c), 153, 157–58, and 159–66 of the TAC are true.

4. If called to testify under oath at an evidentiary hearing on the pending motions for preliminary injunctive relief (Doc. Nos. 258, 260), I would affirm the foregoing facts and allegations to be true.

Pursuant to 28 U.S.C. § 1746, I declare and verify under penalty of perjury that the foregoing is true and correct.

Executed on this date, August 9, 2018.


Megan Missett